



27 Union Square West, Suite 500  
New York, NY 10003

Policy Engagement Department  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

**Avaaz submission to the ICO consultation on "Age appropriate design: a code of practice for online services"**

Dear Ms Denham

31 May 2019

I'm writing from Avaaz which is a global civic organisation with nearly 1.8 million members in the UK, who are part of our global community of over 50 million members across the world. We believe Avaaz has experience and solutions relevant to your consideration of guidance for age appropriate design both in the categories of *the best interests of the child* and *to protect and support children's health and wellbeing; physical, psychological and emotional development*.

We were so glad to hear your submission to the Parliamentary Sub-Committee on Disinformation raising the question of tackling disinformation and saw with interest your joint research study with Ofcom on internet harms which showed that 29% of people were concerned about fake news and disinformation in relation to children. We agree that measures for countering 'fake news' are crucial and that we need to continue to inform citizens of this threat.

Our submission focuses on the dangers of online disinformation on children based on the research that Avaaz has undertaken in this area and we lay out the remedy for how social media should adapt their algorithms and designs to protect children.

We would greatly appreciate the chance to discuss our submission in person and look forward to engaging with your office on these crucial questions.

Sincerely,

### Summary of the Avaaz submission:

The reason for Avaaz's heavy focus on disinformation is that citizens, and particularly **children's understanding of politics, is built through narratives and stories**. According to a study done by the [Stanford History Education Group](#), **children have very poor ability to distinguish between fake and true information. A fifth of UK teenagers spend 5 hours or more everyday on social media** and in the case of disinformation, Avaaz has found harmful disinformation aimed at kids ranging from attacks on youth activists, to encouragement of gambling, anti-vaccination scares and frightening myths.

On YouTube, reports have indicated, the algorithm sends users down a rabbit hole of extremist content that young users may have little resilience to deal with - and often boosts foreign propaganda networks such as Russia Today<sup>1</sup>. On Facebook, our team found that pages that are built around topics youth care about, such as "Free Movies", are used as a "bait and switch" tactic - where millions of users are brought into these pages before they transform into far right disinformation and propaganda machines.

What our team has uncovered is the tip of the iceberg - and we expect to find much worse if platforms were more transparent about the content that children view. But from what we do know, it is clear that simply focusing on removing this content will be like a game of whack-a-mole. Moreover, when this content is detected and removed - it is usually already seen by millions.

### Solution? Correct the record

So instead of playing whack-a-mole, the best solution to increase media literacy for children, and to protect them from disinformation, **is for platforms to work with qualified fact-checkers to design effective corrections, and to then SHOW these corrections to every person exposed to disinformation**, including those who may have seen it days ago. [TIME magazine](#) called this a "radical new proposal" that "could curb fake news on social media."

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1

<https://www.theguardian.com/commentisfree/2018/sep/23/how-youtube-takes-you-to-extremes-when-it-comes-to-major-news-events>

**Avaaz's investigation found European citizens being targeted by massive disinformation networks.**

Avaaz has just concluded an investigation into the spread of disinformation on social media in Europe, intended to influence the European Elections<sup>2</sup>. We focused particularly on Facebook and in a more limited way on WhatsApp. We reported over 500 suspect pages to Facebook, including several in the UK, of which Facebook has taken down around 20%. The trouble is that these pages, filled with hate speech and disinformation, had already been viewed over 700 million times in the last 3 months alone.

Below are the key tactics that the **Avaaz investigation uncovered that would make children particularly vulnerable** as these tactics could elude parental scrutiny.

**Using fake and duplicate accounts:** The creation and use of several duplicate or fake accounts to either amplify content or manage groups and pages. Avaaz believes that some of the most common reasons for this behavior are: artificially boosting interactions with the content being shared by pages; hiding the real identity of the people managing groups and pages to avoid responsibility; and making sure that pages sharing "extreme" content can keep publishing even when some of the accounts are removed or suspended by Facebook for violating their policies.

**Abnormal coordination and sharing of alternative outlets:** The second most common behavior we detected is abnormal coordinated behavior, in which pages and groups mostly share and post content in a highly coordinated manner from a handful of specific "alternative outlets," with little or no editorial reputation. Many of those outlets highlighted in Avaaz's report are publicly known in their countries for reporting fake news, disinformation and using clickbait tactics.

**Recycling followers:** A key tactic used by many pages are deceptive name changes. For example, pages that originally started as lifestyle groups, music communities or local associations are being turned into disinformation pages, "recycling followers" and serving them content completely different than what they had initially signed up for.

**Bait and switch:** An example is when networks create pages with names that cover nearly the entire spectrum of popular interest: football, beauty, health, cooking and jokes. Once the audience is built, the page admins appear to deliberately start boosting political or divisive agendas, often in a coordinated way, on pages that at face value should be completely unrelated to the subject being promoted.

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<sup>2</sup> [https://secure.avaaz.org/campaign/en/disinfo\\_network\\_report/](https://secure.avaaz.org/campaign/en/disinfo_network_report/)

A study done on Twitter found that false information spreads up to 6 times faster than the truth. Even if false content is fact-checked and debunked, millions of people exposed to false content never find out that they have been misled.

Specific examples we have found include material targeted at undermining the children's movement on climate change, portraying the children as dirty, ill-informed and funded by entities such as the EU. There have even been cases where children have been subjected to death threats as a result of fake news. Case studies evidencing these harms, as well as disinformation directed at Children's access to health measures such as vaccination are included at Annex 1.

We also included evidence on how misleading disinformation may be encouraging children to access sites that encourage mysterybox gambling, and even their rights to access digital information can be distorted and limited in the wake of each social media disinformation scare like the Momo meme in Annex 1.

The Children's Commissioner's report<sup>3</sup> into social media use among 8-12 year olds has warned that children are utterly unprepared for the 'cliff edge' around online safety when they transition to secondary school. Bearing in mind the child's fundamental rights under Art. 17 of the Children's Rights Convention,<sup>4</sup> to access to information and material from a diversity of national and international sources, especially those aimed at the promotion of his or her social, spiritual and moral well-being and physical and mental health, we believe that these examples demonstrate the need for age appropriate design to address disinformation. Specifically our proposal below addresses your consultation's request for responses in relation to the categories of *the best interests of the child* and *to protect and support children's health and wellbeing; physical, psychological and emotional development*.

## Correct the Record

The solution to the issues outlined above is simple: Platforms and services must be designed to inform users and push effective corrections **to each and every person who saw the false information in the first place**. Newspapers publish corrections on their own pages, television stations on their own airwaves; platforms and services should do the same.

Corrections work: Multiple peer-reviewed studies have demonstrated that effective corrections can reduce and even eliminate the effects of disinformation<sup>5</sup>. Studies attempting to replicate the often discussed 'backfire effect' -- where corrections inadvertently entrenched false beliefs -- have instead found the opposite to be true.

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<sup>3</sup> Life in 'Likes' Children's Commissioner report into social media use among 8 - 12 year olds - <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2018/01/Childrens-Commissioner-for-England-Life-in-Likes-3.pdf>

<sup>4</sup> <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

<sup>5</sup> See for example Misinformation and its Correction: Continued Influence and Successful Debiasing - Lewandowsky; Ecker; Seifert; Schwarz and Cook, University of Western Australia, University of Michigan, and University of Queensland at <https://journals.sagepub.com/doi/abs/10.1177/1529100612451018?journalCode=psia>



In our view, correcting the record would be a five-step process:

1. **Define:** The obligation to correct the record would be triggered where:
  - Independent fact checkers verify that content is false or misleading;
  - A significant number of people -- e.g. 10,000 -- viewed the content.
2. **Detect:** Platforms and services must:
  - Deploy an accessible and prominent mechanism for users to report disinformation; made particularly prominent for users under 18.
  - Provide independent fact checkers with access to all content that has reached e.g. 10,000 or more people.
3. **Verify:** Platforms and services must work with independent, third-party verified fact-checkers to determine whether reported content is disinformation within 24 hours.
4. **Alert:** Each user exposed to verified disinformation should be notified using the platform or services's most visible notification standard.
5. **Correct:** Each user exposed to disinformation should receive a correction that is of at least equal prominence to the original content, and that follows best practices which should include:
  - Offering a reasoned accessible explanation as to why the original post was wrong;
  - Emphasizing factual information while avoiding, whenever possible, repeating the original misinformation;
  - Securing endorsement by a media outlet or public figure that children are likely to trust.

We believe these elements should be mandated within any age appropriate design guidance for online media aimed at children. We have produced live design concepts for how Correct the Record could look on Facebook, demonstrating how the user can be taken through these steps easily within a normal user journey without leaving the service. We would be happy to demonstrate the design concepts to you and your office live as part of this submission.

Regards etc

## Annex 1: Case studies of disinformation designed to affect the democratic agency, health and well being and of children online

### Case study 1: Children's Climate Strikes for Future - Disinformation to undermine children's democratic agency

We saw numerous examples of disinformation seeking to undermine the children's political climate change movement "Fridays for Future". In addition to trolling and mockery we saw serious attempts to undermine the campaign with allegations that children threw litter irresponsibly, are ill-informed and "stupid" or are being manipulated for hidden economic gain or political agendas.

#### 1) Anuna De Wever

Belgian climate campaigner Anuna De Wever was the target of death threats as a result of disinformation. The stories that were circulated through social media included conspiracy theories alleging political ties between Anuna and the Belgian Green Party.



Caption translation: "#greenparty uses #NESMACONSULTING which is being led by Katrien Van Der Heyden. Her daughter 'happens to be' #anunadewever

Apparently the well-spoken Wunderkind is suddenly the #puppetonastring of her mother and of #greenparty #doIneedtosaymore ?"

This disinformation built on her mother's consultancy company which had worked with the Green Party in 2003 on the theme of gender equality. However, Anuna's mother also worked with other political parties (including right-wing parties') in relation to gender equality. The Green party has no association with Anuna.<sup>6</sup>

There was also disinformation spread on social media that the European Solidarity Corps, a new EU initiative, funded Anuna and the climate strikes. This claim has been debunked see<sup>7</sup>

<sup>6</sup> <https://www.vrt.be/vrtnws/nl/2019/03/15/geruchten-over-anuna-de-wever-co-waar-of-niet-waar/>

<sup>7</sup> Factcheck:

[http://www.standaard.be/cnt/dmf20190211\\_04169660?articlehash=8DF626522A9F6B4B79E8803C334A760ECF6154B8B26364018A30443C480904B865A75BD49CBB187884D8C6CCF5A4CCDC5EDA029ADAAAF5460C4FAE6803046066C](http://www.standaard.be/cnt/dmf20190211_04169660?articlehash=8DF626522A9F6B4B79E8803C334A760ECF6154B8B26364018A30443C480904B865A75BD49CBB187884D8C6CCF5A4CCDC5EDA029ADAAAF5460C4FAE6803046066C)


**The World Today**
7 February · 🌐
Like Page
...

Er is een korps opgericht en een Europese jeugdwerkgroep voor klimaat actie. Ze ontvangen in de periode 2018-2020 € 340.000.000,- om actie te kunnen voeren. En u denkt dat de Belgische Anuna de Wever en de Zweedse Gretha op eigen houtje opereren? U denkt dat de scholieren zichzelf hebben beïnvloed door morgen te gaan staken? Hier zit een enorme lobby achter die al jaren actief is.....

Er zit een groot Europese subsidie orgaan achter die allerlei groepjes steunen om de activist uit te kunnen hangen. De Anuna's en de Greta's zijn niet uniek..... 😊 en ooooooohw.... wat zijn onze politieke leiders meegaand met onze "dappere scholieren", niets geen afkeuring....

Gelukkig heeft gisteravond de eerste (virtuele) ontmoeting van de oprichters van Youth for Climate Belgium met de Zweedse klimaatspijbelaar Greta Thunberg plaatsgevonden.

Anuna De Wever, Kyra Gantois en Adélaïde Charlier, het Waalse gezicht van Youth for Climate, spraken met haar via Skype. Aldus VRT news: <https://www.facebook.com/270994524621/posts/10158146521029622?sfns=st>

Europese Commissie blijkt drijvende kracht achter het klimaatspijbelen.

Misschien dat de Europese Commissie slechts steun geeft aan een spontaan jeugd-klimaatinitiatief? Dat zou dan wel peperdure steun zijn. Het "Europees Solidariteitskorps" (geen verzinsel!), van waaruit het European Youth for Climate Action werkt, krijgt alleen al in 2018 – 2020 wel 340 miljoen euro subsidie van de EU, zo bericht de Europese Commissie. Lees hier het artikel: <https://cultuurondervuur.nu/tag/klimaatmars/>

Het volgende staat op de foto:

"1.6 European Youth for Climate Action

Europe's future will be built by young people. This is why they need to be empowered to develop the capacities and skills to help tackle climate change. One third of the EU population is under the age of 30. The future of our continent will be shaped and experienced by these 170 million young Europeans. The European Commission's Youth for Climate Action Initiative will empower young people to seize on the spirit of renewal and regeneration that is encapsulated in the Paris Agreement, and to shape orders. The European Union has dedicated

The first paragraph states as follows: "A corps and a European youth working group on climate action have been set up. They will receive € 340,000,000 in the period of 2018-2020 in order to be able to take action. And you think that the Belgian Anuna de Wever and the Swedish Gretha operate on their own? Do you think that the students have influenced themselves by going on strike tomorrow? There is a huge lobby behind this, which has been active for years....."

There is a large European subsidy body behind it that supports all kinds of groups in order to be able to be an activist. The Anunas and the Gretas are not unique..... 😊 and ooooooohw.... our political leaders are so amenable towards our "brave students", no disapproval.....

Fortunately, yesterday evening the first (virtual) meeting of the founders of Youth for Climate Belgium with the Swedish climate striker Greta Thunberg took place.

Anuna De Wever, Kyra Gantois and Adélaïde Charlier, the Walloon face of Youth for Climate, spoke to her via Skype. According to VRT news:

<https://www.facebook.com/270994524621/posts/10158146521029622?sfns=st>

The European Commission is proving to be the driving force behind the climate strikes.

Perhaps the European Commission only supports a spontaneous youth climate initiative? That would be very expensive support. The "European Solidarity Corps" (not a fabrication!), from

which the European Youth for Climate Action works, will receive 340 million euros in subsidies from the EU in 2018-2020 alone, according to the European Commission. Read the article here: <https://cultuuronderzoek.nu/tag/klimaatmars/>

They then cite an EU Commission website on European Youth for Climate Action which is an entirely separate organisation, ending with this image of promotional literature from the Commission.

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#### ➡ What will the European Commission do next?

The European Solidarity Corps is the new European Union initiative which creates opportunities for young people to volunteer or work in projects in their own country or abroad that benefit communities and people around Europe. The European Commission has proposed to equip the European Solidarity Corps with a budget of more than €340 million for 2018-2020, covering a broad range of activities. Within this overall budget, the European Solidarity Corps could dedicate over €40 million to creating volunteering opportunities in the areas of environment and climate action by 2020.

An important focus will be on getting the right skills and competences for the labour market of the future, especially in the growing sector of green jobs. Erasmus+ has already given 160,000 people the chance to join training and field projects on environment, energy and climate change. New projects under the European Youth for Climate Action can cover a wide range of activities, from training youth workers to reuse and recycle materials, motivating youngsters to use smartphone applications to save energy, stimulating the spirit of green entrepreneurship, to developing skills in sustainable agriculture (e.g. short food supply chain sustainable forest management), sustainable industry (waste cycle, innovative technologies, digitalisation) or the tertiary sector (green tourism marketing, education). Additional funding transferred from other EU programmes to Erasmus+ could create additional opportunities.

The European Commission is therefore calling for the following actions:

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The European Commission is therefore calling for the following actions:

- 1 Young people to get engaged and benefit from the opportunities offered by European programmes;
- 2 Non-governmental organisations to offer more projects in which young people can participate;
- 3 Member States to increase co-financing for relevant initiatives at national level.

#### Example of projects

##### Vocational and Education Training 'Energy Efficiency and Community Development: Mobility Project'

The project supported work placements for students and apprentices with employers in Spain and Italy that provide energy assessments covering a range of energy efficiency measures and renewable energy technologies.

##### European Solidarity Corps – Värd Vänner Project

Solidarity Corps participants from Italy were hosted in Finland by Värd Vänner, an organisation which promotes sustainability and environmentally friendly solutions in the Turku Archipelago area, supporting cultural landscaping on the islands according to biosphere area regulations.

##### REACH – Reduce Energy Use and Change Habits

This project addresses energy poverty through energy efficiency by training teachers and students in vocational education institutions to become energy advisors to poor households in need of energy savings.



<https://ec.europa.eu/solidaritycorps/en>

**TWT**  
Twitter

45

38 comments 72 shares

Like

Comment

Share

## 2) Littering allegations: Squares left dirty after Fridays for Future march - Italy 15 March 2019

This post received 9,112 shares



The photo is real, but has nothing to do with the strike against climate change. It dates back to 2011 and shows a moment after a demonstration in Rome on May 1st when Pope Wojtyla, who died in 2005, was beatified.

Fact-checked:

<https://pagellapolitica.it/bufale/show/392/la-falsa-foto-della-strada-sporca-dopo-la-manifestazione-contro-il-cambiamento-climatico>

## 2) Allegations of Stupidity : These “children” can no longer be saved ... ultimately stupid! 8 - Germany - 16 March 2019

This post received 1,500 shares

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<sup>8</sup> <http://archive.is/WiYic>





These posters were photoshopped to show the school strikers demanding a rise in electricity and gas prices to save icebergs, and abolishing cars. On the original image, the students demand "School strike for the climate" and "It's our future."

Fact-checked:

<https://correctiv.org/checkjetzt/2019/03/28/gefaelschtes-bild-zur-postsdamer-klimademo-auf-facebook-im-umlauf>

### 3) Allegations of manipulation or control:

#### a) Got caught! The European Commission is behind climate strikes - 6 Feb 2019<sup>9</sup>

This post received 4,333 shares



The headline reads: "Caught! The European Commission is behind climate strikes." The name of a European initiative that helps young people commit to the climate is very similar to the name of the climate truancy movement. But the European Commission itself says that it does not finance or encourage the protests. Fact-checked:

<https://www.nu.nl/nucheckt/5736579/nucheckt-bewering-dat-klimaatspijbelaars-idee-zijn-van-eu-ongefundeerd.html>

#### b) Understand now what's behind it - 9 May 19<sup>10</sup>

<sup>9</sup> <https://archive.fo/1rYb1>

<sup>10</sup> <https://archive.fo/70Fkx>



This post received 4,300 shares



It says: "This is Greta's manager, her name is Neubauer, member of "One Foundation", managed by Bono Vox, Bill Gates and George Soros. Enough?" Luisa Neubauer is a German activist who, along with Greta Thunberg, is among the organizers of the Fridays for Future initiative and ambassador of the One Campaign (not One Foundation, a Chinese NGO that does charity and volunteer work). She does not control Greta Thunberg. Vox, Gates and Soros fund One Campaign.

Fact-checked:

<https://www.bufale.net/questa-e-la-manager-di-greta-il-suo-nome-e-neubauer-membro-di-one-foundation-gestita-da-bono-vox-bill-gates-e-george-soros-ti-basta/>

c) Who's really behind Greta Thunberg? - 2 March 2019

This post received 5,693 shares



## Ecco chi c'è davvero dietro Greta Thunberg

MAR 2, 2019 / 0 COMMENTI / PUNTI DI VISTA / ROBERTO VIVALDELLI

35714  
SHARES



Chi c'è davvero dietro **Greta Thunberg**, la 15enne attivista svedese che ha iniziato la scorsa estate a manifestare una volta la settimana davanti al parlamento di Stoccolma chiedendo un impegno maggiore del suo governo su clima e ambiente? L'adolescente affetta dalla sindrome di Asperger che lotta contro il cambiamento climatico è diventata un simbolo globale, citata di recente anche dal presidente della Repubblica **Sergio Mattarella**.

<https://web.archive.org/web/20190412211018/http://www.occhidellaguerra.it/ecco-chi-ce-davvero-dietro-greta-thunberg/>

The article references a Swedish journalist who argued that Greta's campaign is an advertising strategy for a new book by Greta's mother, a well-known opera singer. Italian fact-checker Butac found that the book has nothing to do with Greta but her sister Beata, who has autism.

Fact-checked: <https://www.butac.it/greta-thunberg-e-gli-occhi-della-guerra/>

## 6) Various trolling ridiculing Greta and climate change campaigners when there was bad weather in May - 5 May 2019

No share data available



Fantastico, dopo la sfilata di Greta , la principessa degli idioti climatici , con le sue paternali sul riscaldamento globale , è un mese che fa freddo e piove .  
PS ma quelli che commentano seriamente con lezioni di meteorologia sono gli stessi che prendono lezioni da una poppante di 16 anni che a malapena ha studiato la tabella degli elementi? Sì.

“Fantastic, after the Greta show, the princess of the climate idiots, with her parents on global warming, we have a month when its cold and raining. PS Those who are making serious comments giving lessons on meteorology are the same people who take lessons from a 16 year old baby who has barely studied the table of periodic elements.



“It’s Sunday. With the cock that went to the sea”



**QUANDO HAI SPACCATO  
I MARRONI AL MONDO INTERO CON  
IL RISCALDAMENTO GLOBALE  
E A MAGGIO NEVICA**

Ridiculing climate change campaigners when it snows in May: “when you split the chestnuts in the whole world with global warming and it snows in May” [needs Italian translation]

## Case study 2: Anti Vaccination Disinformation - Disinformation to undermine children's health online

Avaaz provided the testimony of **Ethan Lindenberger** from the United States to Facebook, who is a teenager who was not vaccinated by his parents. His parents were deeply influenced by anti vaccination content on social media, as Lindenberger [testified earlier this year to the Senate Committee on Health, Education, Labor and Pensions](#). He stated that his mother received most of her anti-vaxx disinformation on Facebook. He stood firm even in the face of anti-vaxx speeches from Dr Rand Paul. We have also seen this content aimed at European parents, see below.

### 1) Do You know What's in a Vaccine?

Shared 267 times since April 2019

This post is still shared by UK users of Facebook<sup>11</sup> although it has been debunked as extremely misleading by the independent fact-checking organisation Full Fact<sup>12</sup>. In essence the item claims that aluminium is in vaccines and is linked to Alzheimer's, dementia, seizures, autoimmune diseases, SIDs and cancer. It claims that Aluminium can accumulate in the brain and cause more damage with each vaccination dose. In fact, there is no evidence that aluminium build up in the brain causes the disease. Studies show that the amount of aluminium we can get from vaccines (and food) is not enough to be unsafe.



### 2) "Interview with a vaccine critical doctor" Facebook<sup>13</sup>

<sup>11</sup> For example at

<https://www.facebook.com/photo.php?fbid=305629426801328&set=a.188976681799937&type=3&theater>

<sup>12</sup> here: <https://fullfact.org/online/vaccine-ingredients/>

<sup>13</sup> <https://deutsch.rt.com/europa/86098-rt-deutsch-interview-mit-impfkritischen-aufklaerer/>



Received by 487,685 followers within 8 hours



RT Deutsch's Facebook account shared [an interview](#) with an alleged pediatrician from Vienna, who voiced strong concerns over vaccinations, claiming he thought the measles outbreak was hyped and that not vaccinating children might be beneficial. This type of anti vaccination content is not permitted by Facebook but still gains wide reach.<sup>14</sup> Its effect on parents can be to encourage them to withhold vaccinations from their children in the incorrect belief that they are protecting them. This was available to UK users with autotranslated text.

### 3) Darla Shine's tweet that Childhood diseases keep you healthy

Darla Shine, the wife of Bill Shine, President Donald Trump's deputy chief of staff for communications, made a series of false and misleading statements about measles and vaccines in early 2019<sup>15</sup>. Shine said to "bring back" childhood diseases because "they keep you healthy & fight cancer." Childhood diseases, can be deadly and there is no medical evidence that they 'protect against cancer'. While survivors gain immunity, the same effect can be achieved far more safely with vaccines.

<sup>14</sup> <https://newsroom.fb.com/news/2019/03/combating-vaccine-misinformation/>

<sup>15</sup> <https://www.factcheck.org/2019/02/darla-shines-measles-misinformation/>



**Darla Shine**  
@DarlaShine



Here we go LOL [#measlesoutbreak](#) on [#CNN](#) [#Fake](#) [#Hysteria](#)

The entire Baby Boom population alive today had the [#Measles](#) as kids

Bring back our [#ChildhoodDiseases](#) they keep you healthy & fight cancer

♡ 645 2:43 PM - Feb 13, 2019



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💬 [5,631 people are talking about this](#)





### Case study 3: Disinformation intended to encourage children to gamble

Our research has also uncovered evidence of disinformation intended to encourage children to engage in mysterybox or “loot box” purchasing, which many are concerned is akin to gambling. Users are encouraged to purchase virtual mystery boxes with the promise they might win high value goods whereas they frequently only win goods of far lower value. The social media content we have observed on services intended for those over 13, like YouTube has the imagery, pace, use of bright primary colours and styling clearly designed to attract a young audience.

- 1) I Spent \$5,000 ON MYSTERY BOXES & You WONT Believe WHAT I GOT... (insane)<sup>16</sup>



This video demonstrates loot box shopping from mysterybrand.net. The presenter promises they are the “best site” where you could win a Rolls Royce or an iPhone etc. Whilst the video makes clear that there is a chance you won’t win high value goods, its disinformation includes statements such as “This is like a good value one [box] I feel, as it costs \$15 and then you can like get iPhones so it’s dope”. The video shows repeat purchasing of boxes as an exciting risk-free fun activity - as there is no warning on limiting spend and the video implies you can sell

<sup>16</sup> <https://www.youtube.com/watch?v=9wO2RIFKMSg>

back the value of goods won that you don't want - but does not say the sale won't necessarily cover the cost you paid to open the box to win lower value goods. MysteryBrand reportedly responded to the "scam" accusation on Instagram, telling one user: "We are not a scam. You can kindly check our third-party reviews with thousands of satisfied customers."<sup>17</sup> However The Gambling Commission has previously said that loot boxes "blur the lines" between video games and gambling and pledged to "thoroughly analyse" how loot boxes are designed to ensure they comply with gambling laws.<sup>18</sup>

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<sup>17</sup>

<https://www.worldtrademarkreview.com/anti-counterfeiting/brands-warned-over-legal-issues-alleged-scam-gambling-platform-mysterybrand>

<sup>18</sup>

<https://www.telegraph.co.uk/technology/2019/01/04/youtubers-criticised-promoting-loot-box-gambling-games-young/>

#### Case study 4: Momo and Astrosnacks - Disinformation to scare children and undermine parents' trust in internet content.

The effect of disinformation intended as a scare meme is the final case study, and like the vaccination study above it affects both children and parents. These malicious hoaxes, such as the Momo challenge, were intended to scare children and took on such a potent narrative that it caused schools in the US and the UK to send warnings to parents to limit their children's access to social media. The child's fundamental rights under the Children's Rights Convention,<sup>19</sup> include the right to access to information and material from a diversity of national and international sources, especially those aimed at the promotion of his or her social, spiritual and moral well-being and physical and mental health. In encouraging parents to make the internet a banned place, rather than a safe place, we isolate and undermine children's trust in the internet as a source of useful information and their resilience in resisting malicious content when they encounter it. The scares can also create harmful atmosphere of panic. UK charities including Safer Internet Centre and the Samaritans have voiced concerns about the effects of disinformation aimed at frightening children or vulnerable people on the internet. This is why correction mechanisms are essential.

##### 1) The Momo challenge<sup>20</sup>



This was reported in mainstream media as an internet game featuring a scary faced bird woman who challenged children on WhatsApp to undertake dangerous activities and produce photo evidence of it, or risk being hurt by her. However it was the initial reports of the game taken up

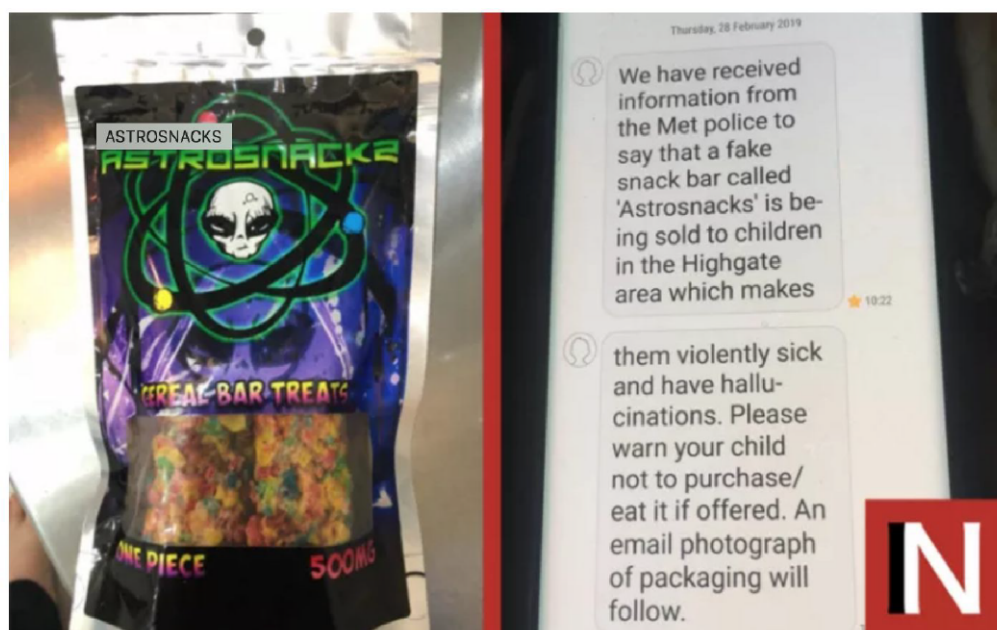
<sup>19</sup> <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

<sup>20</sup> <https://www.nbcnews.com/tech/tech-news/how-momo-global-social-media-hoax-about-paranormal-threat-kids-n977961>

by mainstream media that were the disinformation: no evidence of an original attempt to influence young people existed. The Samaritans stated in relation to this particular scare that, "These stories being highly publicised and starting a panic means vulnerable people get to know about it and that creates a risk."<sup>21</sup> This in turn encourages parents to interfere with their children's digital rights, and stop them accessing digital media through unsupported fears of malign influence on their children.

## 2) Astrosnacks

This disinformation about poisoned children's sweets was circulated on Facebook and WhatsApp in the UK, across London in February 2019<sup>22</sup> alleging that UK Trading Standards authorities had issued a warning that the sweets caused hallucinations and violent sickness. Despite the easily verifiable fact that Trading Standards had not issued any such warning, this disinformation was picked up by schools across North London whose local authorities then sent warnings to parents (see the example below), giving unintended credibility to this pure disinformation. This kind of disinformation undermines the credibility of important health messages from schools and Local Authorities.



<sup>21</sup>

[https://www.theguardian.com/technology/2019/feb/28/viral-momo-challenge-is-a-malicious-hoax-say-charities?CMP=Share\\_iOSApp\\_Other](https://www.theguardian.com/technology/2019/feb/28/viral-momo-challenge-is-a-malicious-hoax-say-charities?CMP=Share_iOSApp_Other)

<sup>22</sup> <http://islingtonnow.co.uk/astrosnacks-hoax-spreads-to-schools-across-london/>



## Message from LB Camden re: Astrosnacks

Dear Parents/Carers

We have had the following message from the local borough:

.....  
.....

'Some of you may be aware of unverified reports circulating about a fake snack bar called "Astrosnacks". They say that they are being sold to children and make people violently sick and have severe hallucinations.

We have sought advice from Public Health and they have given us this information.

The Metropolitan Police is currently leading on this issue, however, normal guidelines apply in terms of getting help if someone is feeling unwell (**contact a GP or NHS 111 for advice**). The concerns are so far unsubstantiated so no formal Public Health England (PHE) alert has been triggered. PHE London works closely with the Metropolitan Police and the London Boroughs and is on hand to provide advice and support as requested.

### **Avaaz contact information:**

For further details about this submission, please get in touch with:

**Alaphia Zoyab** - Senior Campaigner - [REDACTED]

**Sarah Andrew** - Legal Director - [REDACTED]